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March 7, 2018

BY ECF

Honorable Debra C. Freeman
Chief United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Snead v. City of New York, et al.*, 16 CV 9528 (AJN) (DCF)

Your Honor:

I write to request an additional week to comply with Your Honor's Order dated February 7, 2018. This is the second request for this relief. The basis for this request is the trial of *Emamian v. The Rockefeller University*, No. 07 Civ. 3919 (DAB). This trial lasted for 43 days and concluded last week. I have been in contact with Ms. Forbes and we are arraigning a time meet and produce the necessary information.

Currently, production was Ordered today, March 7, 2018. The defendants have been contacted regarding their position, but have yet to respond.¹ Previously, they objected to part of our requested extension. Should this application be granted, production would be due to the defendants by March 14, 2018. I apologize for this delay.

Thank you for your consideration of this request.

Respectfully submitted,



David B. Rankin
Counsel to non-party Wilhelmina Bryant-
Forbes

¹ In fairness, the contact was shortly before this application was filed.